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June 24, 2021

By ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Joshua Adam Schulte*, 17 Cr. 548 (PAC)

Dear Judge Crotty:

We write in brief reply to the government's June 23, 2021 letter regarding Mr. Schulte's interrupted access to the Courthouse SCIF housing the mirror image of the computers at the CIA.

It is imperative that Mr. Schulte get access to the Courthouse SCIF as soon as possible. Mr. Schulte cannot properly prepare for the new trial without access to the mirror image of the CIA computer – the very core of the issue in this case.¹ In this regard, the government's apparent belief that Mr. Schulte can prepare his defense by reviewing "large quantity of declassified exhibits and Section 3500 material outside of a SCIF, as well as using the new SCIF in the USMS space to review classified hard-copy materials and confer with his attorney" (Govt. Letter at 1) is irrelevant and incorrect. Among other things, the CIA computer in the 9th Floor SCIF does not fit in the "new" SCIF housed inside of the Courthouse jail cell. Mr. Schulte faces serious charges and to defend himself against those he need access to the SCIF that houses the CIA computer as soon as possible, especially if the Court grants his request to proceed *pro se*.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Deborah A. Colson, Sabrina P. Shroff, Edward S. Zas
Counsel for Joshua A. Schulte

cc: Government Counsel

¹ Notably, the government continues to block Mr. Schulte's access to the mirror image even as they provide to their outside expert with unfettered access to all of the CIA's computers as part of the government's case-in-chief.